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FILED
DISTRICT COURT OF GUAM

JUN 15 2005 mba

MARY L.M. MORAN
CLERK OF COURT

(1)

IN THE UNITED STATES DISTRICT COURT

FOR THE TERRITORY OF GUAM

05-00048

UNITED STATES OF AMERICA,)
vs.) Plaintiff,
DAN ZHU and)
STEVEN SALII,)
Defendants.)

CRIMINAL CASE _____

INDICTMENT

ALIEN SMUGGLING
[8 U.S.C. § 1324(a)(2)(B)(ii);
and 18 U.S.C. § 2; and 6 U.S.C.
§§ 251 and 557]

THE GRAND JURY CHARGES:

On or about December 5, 2004, within the District of Guam and elsewhere, the defendants herein, DAN ZHU and STEVEN SALII, did unlawfully and knowingly bring and attempt to bring an alien from the Peoples Republic of China, to wit: Yan Qiu, to the United States, knowing and in reckless disregard of the fact that said alien had not received prior official

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1 authorization to come to, enter, or reside in the United States, in violation of Title 8, United
2 States Code, § 1324(a)(2)(B)(ii), and Title 18, United States Code, § 2, and Title 6, United States
3 Code, §§ 251 and 557.

4 DATED this 15th day of June, 2004.

5 A TRUE BILL.

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8 Foreperson

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10 LEONARDO M. RAPADAS
11 United States Attorney
12 Districts of Guam and the NMI

13 By: 
14 KARON V. JOHNSON
15 Assistant U.S. Attorney

16 Reviewed:

17 
18 RUSSELL C. STODDARD
19 First Assistant U.S. Attorney